

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
Civil Action No. 04-CV-11948

SEYED MOHSEN HOSSEINI-SEDEHY,

Plaintiff

v.

ERIN T. WITHINGTON  
and CITY OF BOSTON

Defendants

**DEFENDANT DETECTIVE ERIN T. WITHINGTON'S MOTION FOR  
SUMMARY JUDGMENT**

Defendant Erin T. Withington ("Detective Withington") hereby moves for summary judgment on all counts. Defendant respectfully requests that this Honorable Court grant summary judgment in his favor, pursuant to Fed. R. Civ. P. 56(b). As grounds for his motion, Detective Withington states that Plaintiff's constitutional rights were not violated, and that Detective Withington is entitled to qualified immunity. In support of his motion, Detective Withington submits the attached Memorandum of Law and Local Rule 56.1 statement.

**DEFENDANT REQUESTS AN ORAL ARGUMENT FOR THIS MOTION**

Respectfully submitted,  
DEFENDANT ERIN WITHINGTON,  
By her attorney:

/s/ Helen G. Litsas  
Helen G. Litsas, BBO# 644848  
Assistant Corporation Counsel  
City of Boston Law Department  
Room 615, City Hall  
Boston, MA 02201  
(617) 635-4023

CERTIFICATE OF SERVICE

I, Helen G. Litsas, hereby certify that on this date I served a copy of the foregoing documents upon the plaintiff by filing electronically.

**10/31/05**

**/s/ Helen G. Litsas**

Date

Helen G. Litsas